

Hunt, Liane W.

From: Knight, Steven J.
Sent: Tuesday, May 13, 2025 7:00 PM
To: Amy Gibson
Cc: David Wiley; Kirchner, Christine; Douthit, Jared; Lemons, Chris M.
Subject: Re: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)
Attachments: image001.jpg; image002.jpg

Since the offer to apply the federal statute to the conditional appellate fees only was not withdrawn - it is open - and it is accepted. Thank you.

Sent from my iPhone

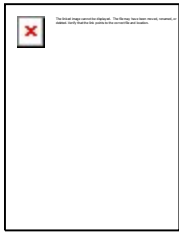
On May 7, 2025, at 5:03 PM, Amy Gibson <amy@gwfirm.com> wrote:

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28 USC 1961(a): “Interest *shall* be allowed on *any money judgment* in a civil case recovered in a district court....”

While we did not seek or receive post-judgment interest in *state court* running from each piece of the conditional appellate fees as each piece was completed, we can start federal post-judgment interest on anything not already accruing interest ... from the time the federal court issues *its* judgment.

Amy Gibson
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E: amy@gwfirm.com



From: Knight, Steven J. <Steven.Knight@CHAMBERLAINLAW.COM>
Date: Wednesday, May 7, 2025 at 3:16 PM
To: Amy Gibson <amy@gwfirm.com>, David Wiley <david@gwfirm.com>
Cc: Kirchner, Christine <c.kirchner@chamberlainlaw.com>, Douthit, Jared <Jared.Douthit@chamberlainlaw.com>, Lemons, Chris M. <Chris.Lemons@chamberlainlaw.com>
Subject: RE: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)

Thank you for clarifying. Can you send me some authority that supports including that?

From: Amy Gibson <amy@gwfirm.com>
Sent: Wednesday, May 7, 2025 3:14 PM
To: Knight, Steven J. <Steven.Knight@CHAMBERLAINLAW.COM>; David Wiley <david@gwfirm.com>
Cc: Kirchner, Christine <c.kirchner@chamberlainlaw.com>; Douthit, Jared <Jared.Douthit@chamberlainlaw.com>; Lemons, Chris M. <Chris.Lemons@chamberlainlaw.com>
Subject: Re: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)

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Steve,

That is federal post-judgment interest on the conditional appellate fees. And we do not agree to change that one.

Amy Gibson
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E: amy@gwfirm.com

<image002.jpg>

From: Knight, Steven J. <Steven.Knight@CHAMBERLAINLAW.COM>
Date: Wednesday, May 7, 2025 at 2:33 PM
To: David Wiley <david@gwfirm.com>, Amy Gibson <amy@gwfirm.com>
Cc: Kirchner, Christine <c.kirchner@chamberlainlaw.com>, Douthit, Jared <Jared.Douthit@chamberlainlaw.com>, Lemons, Chris M. <Chris.Lemons@chamberlainlaw.com>
Subject: RE: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)

David and Amy,

I am waiting to hear from my client about proceeding with your draft – with one exception. The Prior Judgment does not award post-judgment interest on the condition appellate fees. I would direct you to the language in paragraph e on page 5 of 7, limiting the post-judgment interest award to “the amounts above,” which only include the actual damages, the pre-judgment interest award, attorneys’ fees “through the day before the date of this Judgment,” and costs of court. Based on that, are you willing to item g on your proposed final judgment?

Steven Knight
Shareholder

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From: David Wiley <david@gwfirm.com>
Sent: Tuesday, May 6, 2025 11:34 AM
To: Amy Gibson <amy@gwfirm.com>
Cc: Knight, Steven J. <Steven.Knight@CHAMBERLAINLAW.COM>; Kirchner, Christine <c.kirchner@chamberlainlaw.com>; Douthit, Jared <Jared.Douthit@chamberlainlaw.com>; Lemons, Chris M. <Chris.Lemons@chamberlainlaw.com>
Subject: Re: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)

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Steven,

Attached is our draft.

David L. Wiley
Gibson Wiley PLLC
t: (214) 522-2121
f: (214) 522-2126
m: (214) 336-4276
e: david@gwfirm.com

On May 6, 2025, at 10:27 AM, Amy Gibson <amy@gwfirm.com> wrote:

Steve,

We should have a draft to you today.

Amy Gibson
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E: amy@gwfirm.com

<image001.jpg>

From: Knight, Steven J. <Steven.Knight@CHAMBERLAINLAW.COM>
Date: Tuesday, May 6, 2025 at 9:16 AM
To: David Wiley <david@gwfirm.com>
Cc: Amy Gibson <amy@gwfirm.com>, Kirchner, Christine <c.kirchner@chamberlainlaw.com>, Douthit, Jared <Jared.Douthit@chamberlainlaw.com>, Lemons, Chris M. <Chris.Lemons@chamberlainlaw.com>
Subject: RE: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)

Hi David. Just following up on this. How do things stand on your end?

From: David Wiley <david@gwfirm.com>
Sent: Tuesday, April 29, 2025 3:31 PM

To: Knight, Steven J. <Steven.Knight@CHAMBERLAINLAW.COM>

Cc: Amy Gibson <amy@gwfirmlaw.com>; Kirchner, Christine
<c.kirchner@chamberlainlaw.com>; Douthit, Jared
<Jared.Douthit@chamberlainlaw.com>; Lemons, Chris M.
<Chris.Lemons@chamberlainlaw.com>

Subject: Re: Carpenter - Proposed Final Judgment 4_29_2025(32439948.1)

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Thanks, Steven. And for your congratulations before.

We will take a look and plan to get back with you soon about this.

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On Apr 29, 2025, at 2:55 PM, Knight, Steven J.
<Steven.Knight@CHAMBERLAINLAW.COM> wrote:

Amy and David,

Pursuant to the court's recent order, we took the liberty of drafting the parties' proposed final judgment. This, of course, is submitted to you under protest since we do not agree with the judgment and intend to appeal it. Regardless, please let me know if this is approved on your end.

Best,

SJK

Steven Knight
Shareholder

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<Carpenter - Proposed Final Judgment 4_29_2025(32439948.1).docx>